

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

v.

MOTOROLA MOBILITY, LLC,

Defendant.

Civil Action No. 11-cv-908-SLR-MPT

JURY TRIAL DEMANDED

**AMENDED JOINT SUBMISSION CONCERNING
ASSERTED PATENTS, DEFENSES, AND PRIOR ART**

Pursuant to paragraph 61 of the Court's Pretrial Order (D.I. 283, as ordered on January 2, 2014), the parties hereby submit the patent claims, defenses, and prior art references that will be asserted at the January 21, 2014, trial. The Court has limited the first trial to the U.S. Patent Nos. 7,120,462 ("the '462 patent"), 6,557,054 ("the '054 patent"), and 6,658,464 ("the '464 patent").

A. IV will assert the following patents and patent claims:

<u>Patent</u>	<u>Asserted Claims</u>
'462 patent	Claims 1, 8, 10, 11, 13
'054 patent	Claims 151, 159, 162, 181, 189, 192
'464 patent	Claims 1, 8, 16, 17

B. Motorola plans to assert the following defenses:

<u>Patent</u>	<u>Asserted Defenses</u>
'462 patent	Noninfringement; invalidity (anticipation, obviousness).
'054 patent	Noninfringement; invalidity (lack of written description, failure to enable, anticipation, obviousness).
'464 patent	Noninfringement; invalidity (lack of written description, failure to enable, anticipation, obviousness).

C. Motorola plans to assert the following prior art references:

<u>Patent</u>	<u>Asserted Prior Art References</u>
'462 patent	Kobayashi, Nelson, Smith, Boyle, Jenkins, and/or Ethridge.
'054 patent	CompuServe system, Bowen 1984, Bowen 1991, Jones 1987, CompuServe Press Release, CompuServe Q&A, Versteeg post, Diamond 1995, Reynolds 1993, Grube, Fawcett '214, Fawcett '617, and/or Boman.
'464 patent	CompuServe system, Bowen 1984, Bowen 1991, Jones 1987, CompuServe Press Release, CompuServe Q&A, Versteeg post, Diamond 1995, Reynolds 1993, Ogaki, Grube '067, Gilster, and/or Lichty.

Dated: January 19, 2014

Respectfully submitted,

FARNAN LLP

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